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July 28, 2011

BY FACSIMILE (212) 805-4258

The Honorable Debra Freeman
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

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Re: *Ritchie Risk-Linked Strategies Trading (Ireland), Limited et al. v. Coventry First LLC et al.*, Case No. 1:09-cv-01086-VM-DCF

MEMO ENDORSED

Dear Judge Freeman:

Pursuant to the Court's July 25, 2011 order, the parties submit the following proposed modified schedule for the above-captioned matter. The parties agree on all deadlines set forth herein except for those pertaining to dispositive motions, as to which the parties' respective proposals are set forth below.

September 16, 2011—Plaintiffs supplement their contention interrogatory responses pursuant to the Court's July 25, 2011 order.

October 28, 2011—Plaintiffs' expert reports due.

December 9, 2011—Defendants' expert reports due.

December 23, 2011—amended expert reports due.

February 10, 2012—expert discovery closes.

Defendants propose approximate deadlines of 45 days following the close of expert discovery to file any dispositive motions, 45 days to file oppositions thereto, and 21 days to file replies in support thereof. These deadlines would be:

March 21, 2012—dispositive motions due.

May 11, 2012—oppositions to dispositive motions due.

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June 1, 2012—replies in support of dispositive motions due.

Plaintiffs propose approximate deadlines of 30 days to file any dispositive motions, 60 days to file oppositions thereto, and 21 days to file replies in support thereof. These deadlines would be:

March 9, 2012—dispositive motions due.

May 11, 2012—oppositions to dispositive motions due.

June 1, 2012—replies in support of dispositive motions due.

We appreciate the Court's continued attention to these matters.

Respectfully submitted,



Kenneth J. Brown

cc: Counsel of record

The within proposed discovery deadlines are adopted. The parties are directed to consult Judge Marrero's Individual Practices regarding the scheduling of dispositive motions.

SO ORDERED: DATE: 8/2/11



DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE